

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

APR 06 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES OF AMERICA

v.

JUSTIS ELLEN JOHNSON
BRANDON KAVANAGH

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No. 3:22- CR-32

JUDGES

Crytzer/Poplin

INDICTMENT

The Grand Jury charges as follows:

COUNT ONE

(PRODUCTION OF CHILD PORNOGRAPHY)

On or about December 30, 2020, within the Eastern District of Tennessee, defendant JUSTIS ELLEN JOHNSON did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct produced by the defendant using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

(DISTRIBUTION OF CHILD PORNOGRAPHY)

The Grand Jury charges that on or about January 3, 2021, within the Eastern District of Tennessee, defendant JUSTIS ELLEN JOHNSON did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT THREE

(DESTRUCTION OR REMOVAL OF PROPERTY TO PREVENT SEARCH OR SEIZURE)

The Grand Jury further charges that on or about January 14, 2021, within the Eastern District of Tennessee, defendants JUSTIS ELLEN JOHNSON and BRANDON KAVANAGH, aided and abetted by each other, following the search for and seizure of property by duly authorized task force agents with Homeland Security Investigations, did knowingly erase, destroy and remove data on one and more electronic devices, including an Apple iPhone 11, for the purpose of preventing

and impairing the Government's lawful taking of said data into its custody and control, in violation of Title 18, United States Code, Section 2232(a) and 2.

A TRUE BILL:

SIGNATURE REDACTED

GRAND JURY FOREPERSON

FRANCIS M. HAMILTON III
UNITED STATES ATTORNEY

By:

A handwritten signature in black ink, appearing to read "F. M. Dale, Jr.", is written over a horizontal line.

Frank M. Dale, Jr.
Jennifer Kolman
Assistant United States Attorneys